

“Defendant”) as defendant to the above-captioned adversary proceeding, replacing the defendant indicated in the original complaint. On October 9, 2020, the Trustee served a copy of the Amended Complaint and Summons on the Defendant. The deadline for Defendant to answer or otherwise respond to the Amended Complaint was November 9, 2020.

2. On November 6, 2020, the Defendant requested additional time to answer or otherwise respond to the Amended Complaint as the Defendant is in the process of gathering relevant documents. The Trustee, through counsel, agreed to a 30-day extension and the Court granted such extension through December 9, 2020.

3. On December 7, 2020, the Defendant requested further additional time to answer or otherwise respond to the Amended Complaint. The Trustee, through counsel, has agreed to a 9-day extension through December 18, 2020.

4. The Trustee and the Defendant have started negotiations with respect to this claim. The Trustee believes that minimizing the Defendant’s potential legal fees will increase the chances of a consensual resolution of this matter.

5. The Trustee therefore requests a 9-day extension of the deadline for Defendant to answer or otherwise respond to the Complaint through Friday, December 18, 2020.

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WHEREFORE, the Trustee respectfully requests that the Court enter an order extending the answer deadline until December 18, 2020, and for such other and further relief, at law and in equity, as this Court deems just.

Dated: December 9, 2020

Respectfully submitted,

PARKINS LEE & RUBIO LLP

/s/R. J. Shannon

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*Proposed Special Counsel for Rodney D.
Tow, Chapter 7 Trustee for Koontz-Wagner
Custom Control Holdings LLC*

CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2020, I caused a true and correct copy of the foregoing to be served on the Defendant at the following address:

Houston Personnel Service, Inc.
c/o Robert P. Franke
Clark Hill
901 Main Street, Suite 6000
Dallas, TX 75202
bfranke@clarkhill.com

/s/R. J. Shannon

R. J. Shannon